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June 4, 1998

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EX PARTE OR LATE FILED

Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

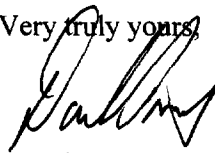
Re: Amendment to Post-Reply Comment Period Submission of Harry J. Pappas, Stella A. Pappas, and Skycom, Inc. in the matter of Preemption of State and Local Zoning and Land Use Restrictions on the Siting, Placement and Construction of Broadcast Station Transmission Facilities: MM Docket No. 97-182
(Ex Parte/Late Filed, as Filed with the Secretary of the Commission)

Dear Ms. Salas:

We represent Harry J. Pappas, Stella A. Pappas and Skycom, Inc. On June 2, 1998, we filed with the Commission are copies of the above-referenced Post-Reply Comment Period Submission. The Exhibits to such Submission were inadvertently omitted. Enclosed herewith are two complete copies of the Submission, including the Exhibits thereto, and the Submission is hereby amended to include such Exhibits.

Also enclosed is a copy of this letter marked "File Copy." Please stamp the enclosed copy of this letter marked "File Copy" to indicate receipt of this filing by the Commission and return such stamped copy to our messenger. Should the Commission or its staff have any questions regarding this filing, please contact the undersigned counsel for Mr. and Mrs. Pappas and for Skycom, Inc.

Very truly yours,



David D. Burns
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: Harry J. Pappas
John Griffith Johnson, Jr., Esq.

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OUR FILE NO.
25203.74877

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JUN - 4 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

***Before the
Federal Communications Commission
Washington, D.C. 20554***

In the Matter of)	
)	
Preemption of State and Local Zoning and)	MM Docket No. 97-182
Land Use Restrictions on the Siting,)	
Placement and Construction of)	
Broadcast Station Transmission Facilities)	

**POST-REPLY COMMENT PERIOD SUBMISSION OF
HARRY J. PAPPAS, STELLA A. PAPPAS, AND SKYCOM, INC.**

(Ex Parte/Late Filed, as filed with the Secretary of the Commission)

John Griffith Johnson, Jr., Esq.
David D. Burns, Esq.
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1299 Pennsylvania Avenue, N.W.
Tenth Floor
Washington, D.C. 20004-2400
Telephone: (202) 508-9500

June 2, 1998

POST-REPLY COMMENT PERIOD SUBMISSION

Harry J. Pappas and Stella A. Pappas (collectively, the "Pappases"), holders of the permit issued by the Commission to construct commercial television station WMMF-TV, Channel 68, Fond du Lac, Wisconsin (the "Station"),^{1/} and Skycom, Inc. ("Skycom"), a Wisconsin corporation wholly owned by the Pappases, by counsel, hereby respectfully submit their Post-Reply Comment Period Submission in response to certain aspects of the Commission's *Notice of Proposed Rulemaking* (the "NPRM"), MM Docket No. 97-182, released August 19, 1997, 12 FCC Rcd. 12504.

In the NPRM, the Commission invited comment generally on the proposal by the National Association of Broadcasters and the Association for Maximum Service Television, Inc. (collectively, the "Petitioners") that the Commission adopt rules providing for the preemption of certain state and local restrictions on the siting and construction of broadcast station transmission facilities. The Pappases and Skycom filed Comments on October 30, 1997 supporting the proposals of the Petitioners and providing information with respect to the Pappases' and Skycom's experiences with state and local authorities in connection with their attempts to construct the Station. This Post-Reply Period Submission is being filed to bring to the

^{1/} File No. BPCT-870610KN, as modified.

Commission's attention an ordinance (the "Ordinance") recently adopted by the Board of Supervisors of Dodge County, Wisconsin.^{2/}

This ordinance imposes a 500-foot height limitation on all towers, antennas and communications facilities located in Dodge County, Wisconsin. Because "antenna" is defined as "any exterior apparatus designed for telephonic, radio *or television* communications,"^{3/} the ordinance appears to apply to television towers.

The ability of television broadcasting stations whose towers are in Dodge County to serve the public is seriously hampered by this 500-foot limitation. Exhibit B hereto shows the predicted Grade B contour of the Station as licensed by the Commission (*i.e.*, with an antenna at 1660 feet HAAT) and the predicted Grade B contour of the station were the overall antenna height reduced to 500 feet, with the resulting HAAT reduced to 454 feet. Placing the antenna at that height would result in the loss of service to 1,707,196 persons, representing a loss of service to approximately 64 percent of the population which would be served if the Station were able to operate with its antenna as its authorized height.

^{2/} The Ordinance, styled "An Ordinance to Create Standards for Wireless Communication Facilities, Dodge County, Wisconsin," was adopted by the Town of Elba, Wisconsin (where the proposed tower for the Station is to be located). Consequently, the Ordinance is applicable to the Station's proposed tower. A copy of the Ordinance is attached hereto as Exhibit A.

^{3/} Ordinance, section 6.0 (emphasis added).

In addition, such a decrease in the height of the Station's tower would preclude proper service to Fond du Lac. Attached as Exhibit C is a map showing the boundary of Fond du Lac as well as portions of the 80 dbu contours of the Station, based on its authorized facility and on its changed facility, including the 500-foot limit. As indicated, the authorized facility provides 80 dbu service to all of Fond du Lac, while the changed facility would provide 80 dbu service to none of Fond du Lac.

The enormous loss of service which would result from the Station being forced to operate with its antenna at 500 feet is not offset by any significant advantage to the residents of Dodge County. Dodge County is principally a rural county and the Station's tower will be sited in an area which is used almost solely for agricultural purposes. The presence of a taller tower in this location poses no significant threat to life, limb or property, nor is a taller tower significantly less aesthetic than a 500-foot tower. In fact, the 500-foot limitation does not, in any way, further any of the five goals expressly stated as the intent of the Ordinance, and in fact is contrary to at least one of such goals.^{4/}

4/ The Ordinance provides that its intent is to:

- a) encourage the location of towers in non-residential areas and minimize the total number of towers throughout the county.
- b) encourage collocation of new and existing tower sites.
- c) encourage users of towers and antennas to locate them to the extent possible, in areas where the adverse impact on the community is minimal.
- d) encourage users of towers and antennas to configure them in a way that minimizes the adverse visual impact of the towers and antennas.
- e) enhance the ability of the providers of communication services to provide such

(continued...)

In short, the Ordinance represents an exercise in arbitrary and capricious municipal lawmaking, to the extreme detriment of broadcasters. If all municipalities were to pass ordinances containing 500-foot limitations on the height of communications towers, it is difficult to imagine how television, and perhaps FM radio as well, could remain a viable service in many parts of the country. With the advent of digital television service, it becomes even more important for municipalities to demonstrate flexibility in their regulation of television towers. The Pappases and Skycom agree that tall towers such as the one proposed for the Station should generally be located in rural areas. However, there is no justification for such a detrimental and arbitrary restriction on the height of a tower which has always been proposed to be located in a rural area.

The Dodge County Ordinance is only one example of the manner in which some municipalities, frequently lacking any understanding or appreciation of the engineering aspects of broadcasting, overstep the limits of their proper land-use function and in the process do substantial injury to the broadcast industry and to the public which the industry seeks legitimately to serve. The Pappases and Skycom respectfully urge the Commission to adopt the Petitioner's

4/ (...continued)
services to the community quickly, effectively and efficiently.

Ordinance, section 1.1.


The proposed site for the Station's tower is a non-residential area, on privately owned agricultural land, where the adverse impact on the community, including the adverse visual impact, will be minimal. There is no existing broadcasting tower in that area on which the Station's antenna could be located. Moreover, the 500-foot limitation is contrary to the fifth criterion set forth above, in that it would impede the ability of providers of communications services to provide effective service to the community by severely limiting the coverage of television and FM radio broadcast stations.

proposal as a fair and equitable means of balancing the legitimate interests of local authorities with the needs of broadcasters to serve the public.

Respectfully submitted,

HARRY J. PAPPAS and STELLA A. PAPPAS
SKYCOM, INC

By:



John Griffith Johnson, Jr.
David D. Burns
Their Counsel

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1299 Pennsylvania Avenue, N.W., Tenth Floor
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June 2, 1998

Certificate Of Service

Alicia Altamirano, a secretary in the law firm of Paul, Hastings, Janofsky & Walker LLP, hereby certifies that she has on this 4th day of June, 1998, caused copies of the foregoing **"POST-REPLY COMMENT PERIOD SUBMISSION OF HARRY J. PAPPAS, STELLA A. PAPPAS AND SKYCOM, INC."** to be mailed to the following by first-class United States mail, postage prepaid:

Henry L. Baumann, Esq.
Barry D. Umansky, Esq.
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Washington, D.C. 20036

Robert T. Warner
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Oshkosh, WI 5903-3086

Victor Tawil
Association for Maximum Service
Television, Inc.
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Washington, D.C. 20036

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Dodge County Corporation Counsel
Dodge County Administration
Building
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Juneau, WI 53039

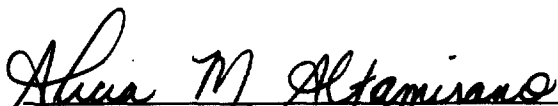

Alicia Altamirano

EXHIBIT A

AN ORDINANCE TO CREATE STANDARDS FOR WIRELESS COMMUNICATION FACILITIES, DODGE COUNTY WISCONSIN

WHEREAS THE SUBJECT MATTER OF THIS ORDINANCE HAS BEEN DULY REFERRED TO AND CONSIDERED BY THE DODGE COUNTY PLANNING AND SURVEYOR COMMITTEE AND A PUBLIC HEARING HAVING BEEN HELD, AFTER THE GIVING THE REQUISITE NOTICE AND SAID HEARING AND A RECOMMENDATION THEREON HAVING BEEN REPORTED TO THE BOARD OF SUPERVISORS, DODGE COUNTY, WISCONSIN AS REQUIRED BY SECTION 59.69 OF THE WISCONSIN STATUTES.

The Board of Supervisors of Dodge County, Wisconsin, pursuant to Section 59.69(5)(b), Wisconsin Statutes, does hereby ordain as follows:

1.0 PURPOSE

The purpose of the Ordinance is to promote the health, safety, property value, aesthetics and general welfare of the County by establishing a program to ensure the effective regulation and restriction of wireless communication facilities in Dodge County.

1.1 STATEMENT OF INTENT

The purpose of this ordinance is to establish minimum standards for the siting of towers, antennas and other communication facilities. The intent of this ordinance is to:

- a) encourage the location of towers in non-residential areas and minimize the total number of towers throughout the county,
- b) encourage collocation of new and existing tower sites,
- c) encourage users of towers and antennas to locate them to the extent possible, in areas where the adverse impact on the community is minimal,
- d) encourage users of towers and antennas to configure them in a way that minimizes the adverse visual impact of the towers and antennas, and
- e) enhance the ability of the providers of communication services to provide such services to the community quickly, effectively and efficiently.

1.2 JURISDICTION

The jurisdiction of this Ordinance shall include all lands and waters within the boundaries of Dodge County, lying outside the limits of incorporated cities and villages, but shall not be in effect in any town until approved by the Town Board of that town in accordance with Section 59.69 of the Wisconsin Statutes.

2.0 APPLICABILITY

The requirements of this Ordinance shall apply to all towers, antennas and other communication facilities, except that towers and antennas that are under 70 feet in height and are owned and operated by federally-licensed amateur radio station operators or are receive-only antennas shall be exempt from this Ordinance.

2.1 PRE-EXISTING TOWERS AND ANTENNAS

Towers and antennas for which a permit has been properly issued prior to the effective date of this Ordinance shall not be required to meet the requirements of this Ordinance.

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3.0 GENERAL PROVISIONS**3.1 PRINCIPAL OR ACCESSORY USE**

Towers and antennas may be considered either principal or accessory uses. A different existing use or an existing structure on the same lot shall not preclude the installation of an antenna or tower on such lot. For purposes of determining whether the installation of a tower or antenna complies with zoning regulations, including but not limited to setback requirements, lot coverage requirements, and other such requirements, the dimensions of the entire lot shall control, even though the antennas or towers may be located on leased parcels within such lots. Towers that are constructed and antennas that are installed in accordance with the provisions of this Ordinance shall not be deemed to constitute the expansion of a nonconforming use or structure.

3.2 AESTHETICS; LIGHTING

- 1) Towers shall either maintain a galvanized steel finish or subject to any applicable standards of the FAA, be painted a neutral color, so as to reduce visual obtrusiveness and blend in to the natural setting and built environment.
- 2) At a tower site, the design of the buildings and related structures shall, to the extent possible, use materials, colors, textures, screening and landscaping that will blend the tower facilities to the natural setting and built environment.
- 3) If an antenna is installed on a structure other than a tower, the antenna and supporting electrical and mechanical equipment must be of a neutral color that is identical to, or closely compatible with, the color of the supporting structure so as to make the antenna and related equipment as visually unobtrusive as possible.
- 4) Towers shall not be artificially lighted, unless required by the FAA or other applicable authority. If lighting is required, the governing authority may review the available lighting alternatives and approve the design that would cause the least disturbance to the surrounding views.

3.3 FEDERAL REQUIREMENTS

All towers shall meet or exceed current standards and regulations of the FAA, the FCC and any other agency of the federal government with the authority to regulate towers and antennas.

3.4 OTHER REQUIREMENTS

- 1) Towers and antennas shall not be used for displaying any advertising.
- 2) If a tower is to be located on a leased parcel of land, the term of the lease for the tower site shall not exceed a ten (10) year period. Leases that exceed ten (10) years would constitute a land division subject to the provisions of the Dodge County Subdivision Control Ordinance. Leases which contain an initial term of less than ten (10) years and which contain a provision by which the term of the lease can be extended beyond the initial term, and the sum of the initial term plus any successive term or terms, exceeds ten (10) years, and which contain a provision or provisions that both lessor and lessor can terminate the lease during the initial term and during any successive term and terms, does not constitute a land division subject to the provisions of the Dodge County Subdivision Control Ordinance.
- 3) No tower shall exceed five hundred (500) feet in height.

3

4.0 PERMITTED USES

4.1 A permit is required from the Dodge County Land Use Administrator for the following permitted uses:

- 1) Locating an antenna that adds no more than 20 feet to the height of an alternative tower structure, including placement of additional buildings or other supporting equipment used in connection with said antenna.
- 2) Installing an antenna on an existing tower that adds no more than twenty (20) feet to height of the existing tower, including placement of additional buildings or other supporting equipment used in connection with said antenna.

5.0 CONDITIONAL USE PERMITS

5.1 CONDITIONAL USES

Locating a tower, including the placement of additional buildings or other supporting equipment used in connection with said tower shall require a Conditional Use Permit.

The Committee may authorize the Land Use Administrator to issue a Conditional Use Permit after review and a public hearing, provided that such conditional use is in accordance with the purpose and intent of this Ordinance and is found not to be hazardous, harmful, offensive or otherwise adverse to the environment or the value of the area.

5.2 PUBLIC HEARINGS

Public hearings on applications for Conditional Use Permits under this Ordinance shall be held by the Committee following receipt of the application by the Land Use Administrator. There shall be published a Class One (1) Notice as provided in Chapter 985 of the Wisconsin Statutes. The Committee shall notify all abutting or opposite property owners, as listed by the applicant in the original application, of the time, date and subject matter of the hearing. Failure to comply with this provision shall not, however, invalidate any previous or subsequent action on the application.

Applications for Conditional Use Permits under this Ordinance shall be made in duplicate to the Land Use Administrator on forms provided by his or her office. Such applications shall be forwarded to the Committee by the Land Use Administrator.

5.3 FACTORS CONSIDERED IN GRANTING PERMITS

The Committee shall consider the following factors in determining whether to issue a permit, although the Committee may waive or reduce the burden on the applicant of one or more of these criteria if the Committee concludes that the intent of this Ordinance are better served thereby.

- 1) Height of the proposed tower;
- 2) Proximity of the tower to residential structures and residential district boundaries;
- 3) Nature of uses on adjacent and nearby properties;
- 4) Surrounding topography;
- 5) Surrounding tree coverage and foliage;

- 6) Design of the tower, with particular reference to design characteristics that have the effect of accommodating other users and reducing or eliminating visual obtrusiveness; and
- 7) Proposed ingress and egress; and
- 8) Availability of suitable existing towers and other structures.

5.4**AVAILABILITY OF SUITABLE EXISTING TOWERS OR OTHER STRUCTURES**

No new tower shall be permitted unless the applicant demonstrates to the reasonable satisfaction of the Committee that no existing tower or structure can accommodate the applicant's proposed antenna. Evidence submitted to demonstrate that no existing tower or structure can accommodate the applicant's proposed antenna may consist of any of the following:

- 1) No existing towers or structures are located within the geographic area required to meet applicant's engineering requirements.
- 2) Existing towers or structures are not of sufficient height to meet applicant's engineering requirements.
- 3) Existing towers or structures do not have sufficient structural strength to support applicant's proposed antenna and related equipment.
- 4) The applicant's proposed antenna would cause electromagnetic interference with the antenna on the existing towers or structures, or the antenna on the existing towers or structures would cause interference with the applicant's proposed antenna.
- 5) The fees, costs or contractual provisions required by the owner in order to share an existing tower or structure or to adapt an existing tower or structure for sharing are unreasonable. Costs exceeding new tower development are presumed to be unreasonable.
- 6) The applicant demonstrates that there are other limiting factors that render existing towers and structures unsuitable.

5.5**ACCOMMODATIONS OF OTHER USERS (COLLOCATION)**

- 1) Any proposed communication tower and tower site shall be designed, structurally, electrically and in all respects to accommodate collocation of both the applicant's antenna(s) and comparable antenna(s) for at least two additional users. Towers and tower sites shall be designed to allow for future rearrangement of antennas upon the tower, to accept antennas mounted at varying heights, and to accommodate supporting buildings and equipment.
- 2) The holder of a permit for a tower shall allow collocation for at least two additional users and shall not make access to the tower and tower site for the additional users economically unfeasible. If additional user(s) demonstrate (through an independent arbitrator or other pertinent means) that the holder of a tower permit has made access to such tower and tower site economically unfeasible, then the permit shall become null and void.

5.6 SETBACKS AND SEPARATION

The following setbacks and separation requirements shall apply to all towers and antennas for which a permit is required; provided, however, that the Committee may reduce the standard setbacks and separation requirements if the intent of this ordinance would be better served thereby.

- 1) Towers shall be setback a distance equal to the height of the tower from any residential structure.
- 2) Towers, guy wires and accessory facilities must satisfy all applicable zoning ordinance setback requirements.

5.7 SECURITY FENCING

Tower sites shall be enclosed by security fencing and shall be equipped with an appropriate anti-climbing device sufficient to deter the general public from obtaining access to the site.

5.8 LANDSCAPING

The following requirements shall govern the landscaping surrounding towers, however, the Committee may waive such requirements if the intent of this ordinance would be better served thereby.

- 1) Tower facilities shall be landscaped with a buffer of plant material that effectively screens the view of the tower site from adjacent property. The standard buffer shall consist of a landscaped strip at least four (4) feet wide outside the perimeter of the security fencing.
- 2) In locations where the visual impact of the tower would be minimal, the landscaping requirement may be reduced or waived altogether.
- 3) Existing mature tree growth and natural land forms on the site shall be preserved to the maximum extent possible. In some cases, such as towers sited on large, wooded lots, natural growth around the property perimeter may be sufficient buffer.

5.9 REMOVAL OF ABANDONED ANTENNAS AND TOWERS

Any antenna or tower that is not operated for a continuous period of twelve (12) months shall be considered abandoned. In such circumstances, the following shall apply:

- 1) The owner of such antenna or tower or owner(s) of the property where the tower site is located shall remove said antenna and or tower including all supporting equipment and building(s) within ninety (90) days of receipt of notice from the Land Use Administrator notifying the owner of such abandonment. If removal to the satisfaction of the Land Use Administrator does not occur within said ninety (90) days, the Land Use Administrator may remove and salvage said antenna or tower and all supporting equipment and building(s) at the property owner's expense. If there are two or more users of a single tower, then this provision shall not become effective until all users cease using the tower.
- 2) The applicant for a permit under this ordinance shall submit a copy of a signed agreement between the property owner and owner of the tower, antenna(s) and supporting equipment and building(s) detailing requirements for abandonment and subsequent removal based on the provisions of 5.9(1). Said agreement shall also identify that the agreement shall be binding on future property owner(s) and future owner(s) of a tower, antenna and all supporting equipment and building(s).

6.0

DEFINITIONS

As used in this ordinance, the following terms shall have the meanings indicated:

Alternative Tower Structure shall mean man-made structures such as clock towers, water towers, buildings, silos, bell steeples, light poles and similar alternative-design mounting structures that camouflage or conceal the presence of antennas or towers.

Antenna shall mean any exterior apparatus designed for telephonic, radio or television communications through the sending and/or receiving of electromagnetic waves, digital signals, radio frequencies, wireless telecommunications signals, including but not limited to directional antennas, such as panel(s), microwave and satellite dishes and omni-directional antennas, such as whip antennas.

Collocation shall mean the location of multiple antennas of more than one commercial wireless communication service provider or governmental entity on a single tower or alternative tower structure.

Committee shall mean the Dodge County Planning and Surveyor Committee.

FAA shall mean the Federal Aviation Administration.

FCC shall mean the Federal Communications Commission.

Height shall mean, when referring to a tower or other structure, the distance measured from ground level to the highest point on the tower or other structure, even if said highest point is an antenna.

Land Use Administrator shall mean the Dodge County Land Use Administrator or his or her designee.

Personal Communications Service (PCS) shall mean a provider of personal wireless service facilities as now defined in Section 704 of the Telecommunications Act of 1996, 47 U.S.C. par. 332, and as the same may be amended from time to time.

Personal Wireless Facilities shall mean transmitters, antenna structures and other types of installations used to provide personal wireless services.

Tower shall mean any structure that is designed and constructed primarily for the purpose of supporting one or more antennas, including self-supporting lattice towers, guy towers or monopole towers. The term includes personal communication service towers, radio and television transmission towers, microwave towers, common-carrier towers, cellular telephone towers, alternative tower structures, and the like.

Tower Site shall mean the area encompassing a tower and all supporting equipment, structures, paved or graveled areas, fencing and other items used in connection with said tower.

7.0

ENFORCEMENT

The Dodge County Planning and Development Department and Land Use Administrator shall enforce this ordinance. The Dodge County Corporation Counsel shall prosecute violations of this ordinance in the Dodge County Circuit Court.

The Land Use Administrator or his or her deputies may enter the subject property at any reasonable time to conduct on-site inspections to determine if all conditions applied to the Conditional Use Permit have been met.

8.0

VIOLATIONS

It shall be unlawful for any person, firm, or corporation to install or locate any tower, antenna or related facilities in Dodge County, in violation of any of the provisions of this Ordinance. In case of any violation, Dodge County, the County Board of Supervisors, the Land Use Administrator, the Committee or any property owner who would specifically be damaged by such violation, may institute appropriate action or proceeding to enjoin a violation of this Ordinance.

9.0

PENALTIES

Any person, firm or corporation who fails to comply with the provisions of this Ordinance shall upon conviction thereof, cease and remove any equipment placed in violation of this ordinance. Further, any person convicted of violating this ordinance shall forfeit not less than five hundred (\$500.00) dollars nor more than two thousand (\$2,000.00) dollars and costs of prosecution for each violation and in default of payment of such forfeiture and costs shall be imprisoned in the County jail until payment thereof, for a period not to exceed thirty (30) days. Each day a violation exists or continues shall constitute a separate offense.

10.0

APPEAL

Appeals from the decision of the Land Use Administrator or Committee concerning the literal enforcement of this Ordinance may be made by any person aggrieved or by an officer, department, board or bureau of the County. Such appeals shall be filed with the secretary of the Dodge County Board of Adjustment and the officer from whom the appeal is taken within thirty (30) days after the date of written notice of the decision or order of the Land Use Administrator or the Committee. The Board of Adjustment for Dodge County as created under the Dodge County Highway Setback Ordinance, is hereby designated as the Board of Adjustment for the purpose of hearing appeals and applications and granting variances to the provisions of this ordinance in harmony with its purpose and intent. The rules and bylaws of the Board of Adjustment as referred to in Section 9.0 of the Zoning Ordinance, Dodge County, Wisconsin, shall apply, as amended.

11.0

FEE

The fee for a Conditional Use Permit under this Ordinance shall be consistent with the Dodge County Planning and Development Department Fee Schedule.

This ordinance shall be in full force and effect upon adoption, and publication as provided by law.

All ordinances or parts of ordinances inconsistent with or in contradiction of the provisions of this ordinance are hereby repealed.

Adopted and approved this 16th day of December, 1997.

Charles Swain
Chairman

Dorothy Ebert
County Clerk

CF-18

WORLD AERONAUTICAL CHART
SCALE 1:1,000,000

HAAT = 1660 FEET

HAAT = 454 FEET

WMMF-TV

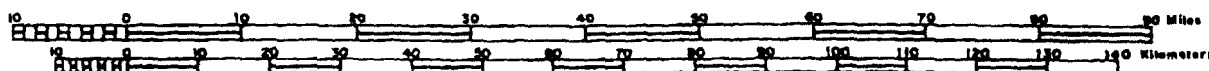
GRADE B POPULATION

1660 FEET: 2,646,983
454 FEET: 939,787
DIFFERENCE: -1,707,196

PREDICTED GRADE B CONTOURS

WMMF-TV
CHANNEL 68 - FOND DU LAC, WISCONSIN

SMITH AND FISHER



MADISON, WISCONSIN

1957
REVISED 1982

HAAT = 1660 FEET

HAAT = 454 FEET

37.0°
WILDLIFE
REFUGE

WMMF-TV

EXHIBIT C

PREDICTED 80 dbμ CONTOURS

**WMMF-TV
CHANNEL 68 - FOND DU LAC, WISCONSIN**

SMITH AND FISHER

